

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION <hr/> THIS DOCUMENT RELATES TO: WAVE CASES ON ATTACHED EXHIBIT A	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
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**PLAINTIFFS' MOTION TO EXCLUDE THE GENERAL CAUSATION
OPINIONS OF PETER JEPPSON, MD**

COMES NOW Ethicon Wave Plaintiffs listed in Exhibit A, by and through the undersigned attorneys, and file this *Daubert* Motion to Exclude the General Causation Opinions of Peter Jeppson, MD, and would respectfully show the Court that Dr. Jeppson should be excluded for the following reasons:

1. Dr. Jeppson is not qualified by education or experience to offer opinions concerning the adequacy of labeling information contained in IFUs or any other device labeling, or FDA regulatory matters.
2. In rendering his opinions on labeling, Dr. Jeppson had no underlying regulatory knowledge of the devices he claims to be expert in, thus rendering his opinions unreliable. Neither did he have any knowledge of when Ethicon became aware of various risks associated with its mesh devices, yet he still came to the conclusion that that the IFU warnings were adequate. Because Dr. Jeppson's opinions lack a reliable foundation, they are unreliable and should be excluded.

3. In support of this motion, Plaintiffs have submitted a memorandum of law and also rely upon the exhibits attached to this motion.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that the Court grant their Motion to Exclude the General Causation Opinions of Peter Jeppson, MD. Additionally, Plaintiffs request all other and further relief to which they may be justly entitled.

Dated: June 3, 2019.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on June 3, 2019, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/ Bryan F. Aylstock
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